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Docket Number 50-346

License Number NPF-3

Serial Number 3012

March 11, 2004

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555-0001

Subject: Correction of Information Provided Regarding Status of the Design Basis Validation Program

Ladies and Gentlemen:

During an Extent of Condition (EOC) review of prior NRC submittals for completeness and accuracy, minor inaccuracies were identified with information provided for the Davis-Besse Nuclear Power Station (DBNPS) in FirstEnergy Nuclear Operating Company (FENOC) letter Serial Number 2623, "Status of the Design Basis Validation Program and the Planned Program to Convert to the Improved Standard Technical Specifications," dated December 17, 1999. Corrections to this letter are specified below:

• The paragraph starting at the end of Page 2 and continuing on to Page 3 should be modified as shown below (double underline indicates new inserted text; strikethrough indicates deleted previous text):

<u>Approximately</u> Ffifty of the open items were initially categorized as having "important" safety-significance for resolution. The open items not categorized as "important" were captured for later disposition. Of these <u>approximately</u> fifty items, <u>approximately thirteen</u> twelve-were subsequently categorized as "potential nonconforming conditions" in accordance with the DBNPS procedure NG-NA-00702, "Corrective Action Program" and were entered into the corrective action program for timely resolution. No equipment operability, functionality, or reportable concerns were identified. The review did not identify any discrepancies that impacted any licensing basis commitments. The remaining

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thirty-eight "important" items (approximately thirty-seven) were entered into the DBNPS Corrective Actions Tracking System for follow up resolution and disposition.

• The first full paragraph on Page 3 should be modified as shown below:

Design Basis Validation Reports have been prepared for each of the <u>twenty-nine-thirty</u> systems capturing the above information, including the listing of each system's open items. The DBNPS Plant-and Design Basis Engineering staffs <u>hashave</u> reviewed these reports. The disposition of the open items for each system is currently scheduled to be completed by December 31, 2000.

- In Attachment 1, Page 1, "Spent Fuel Pool Cooling System" should be deleted from the list of systems under the heading "Plant Systems Within Design Basis Validation Program Scope."
- The following paragraph should be inserted at the top of Attachment 1, Page 3:

Spent Fuel Pool Cooling System: Due to the spent fuel pool re-racking project, analyses of the Spent Fuel Pool Cooling System are being updated. Accordingly, the Spent Fuel Pool Cooling System was removed from the scope of the Design Basis Validation Program.

FENOC does not believe that the minor inaccuracies being corrected by this letter constitute information that is inaccurate or incomplete in any material respect. The corrections specified above address statements of fact that may have been incomplete or inaccurate at the time of the original submittal. No attempt has been made to update the contents of letter Serial Number 2623 with currently available information regarding the scope and status of the Design Basis Validation Program or the conversion to improved Standard Technical Specifications. However, supplemental information related to the adequacy and availability of Davis-Besse Nuclear Power Station design basis information was submitted to the NRC in letter Serial Number 2998, dated November 20, 2003, and an updated forecast for submittal of a license amendment application to convert to use of the improved Standard Technical Specifications was submitted to the NRC in letter Serial Number 3025, dated February 25, 2004.

Should you have any questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (419) 321-8450.

Very truly yours,

MUB Bill

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Enclosure

cc: Regional Administrator, NRC Region III

J. B. Hopkins, NRC/NRR Senior Project Manager

C. S. Thomas, NRC Region III, DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Manager – Regulatory Affairs (419-321-8450) at the DBNPS of any questions regarding this document or any associated regulatory commitments.

COMMITMENTS	<u>DUE DATE</u>
None	N/A